

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the matter of	)	
	)	
	)	WT Docket No. 05-235
Amendment of Part 97 of the	)	
Commission's Rules to Implement	)	
WRC-03 Regulations Applicable to	)	
Requirements for Operator Licenses	)	
In the Amateur Radio Service	)	
	)	

**Comments on the Notice of Proposed Rule Making and Order**

The elimination of a requirement for proficiency in Morse code for the General Class amateur radio operator's license appears to be both inevitable and appropriate in light of current technology and culture. It is likely that the long term prospects for the growth of the amateur service will benefit from this proposed change in the General Class licensing requirement.

However, the Amateur Extra Class license is another matter. The Extra Class written examination requires knowledge of a vast array of electronic theory, regulations and technical information. The extent and difficulty of the material involved in the Extra Class written examination is accepted almost without challenge or criticism as the *sine qua non* for achieving this highest rank in the amateur licensing structure. Nevertheless, no one can honestly dispute that a substantial portion of the required material studied by an applicant in preparing for the Extra Class written examination is rarely, if ever, utilized by a licensee.

Relatively few amateurs will ever operate an amateur radio station on board a sea-going ship and fewer still will operate their own space station. Yet, applicants for the Extra Class license must be familiar with rules and regulations related to such operations. Similar comments can be made with respect to much of the theory and technical information required for the written examination. With the recognition that much, if not most, of the material learned by an applicant to pass the Extra Class written examination will rarely or never be utilized by that applicant after obtaining the license, then the decision to eliminate Morse code knowledge as a requirement for that license must be reconsidered.

Obviously, each mode of communication has its merits and no amateur radio operator is required to maintain the ability to operate all possible modes. However, there are unique aspects to the value of Morse code. It is a mode of communication that allows amateurs without knowledge of each other's language to exchange meaningful, if limited, information. In an emergency situation, such a

capability cannot be overvalued. Further, the simple equipment needed for Morse code transmission and reception means that an amateur considering a first building project is more likely to attempt the construction of a transmitter that is only capable of Morse code transmission. This first venture into a construction project may lead to more complicated equipment construction capable of other modes; projects that may not have been attempted without a simple first step.

Many in favor of eliminating Morse code knowledge requirements from all license classes note that those interested in utilizing Morse code will continue to have that mode available as an option. Such an observation is true and it is a major argument in favor of eliminating the requirement from the more standard General Class license. However, the Extra Class license expects much more of an applicant. The Extra Class license already requires knowledge of esoteric technical information and regulations rarely used by most amateurs, including those who obtain the Extra Class license.

Morse code can hardly be considered esoteric. It is often difficult to learn and always requires significant effort; much in the same way as many of the topics contained in the written portion of the Amateur Extra Class examination. Human nature being what it is, many of us will avoid unnecessary difficulties and efforts in life. If there were no requirements to study a wide array of advanced electronic theories and radio regulations for the Extra Class license examination, then most of those presently holding the license would not have studied any more than those areas in which they have a personal interest. Nonetheless, by being forced to study areas in which we do not perceive an interest or need, we benefit by possessing increased knowledge and personal options. Likewise, very few will choose to learn Morse code if it is purely optional. However, once learned, many thousands of amateurs find it to be a valuable and pleasant mode of operation. Requiring knowledge of Morse code for the Amateur Extra Class license should be retained as a reasonable and appropriate expectation when seeking the highest license class.

At the other end of the licensing spectrum, there is reason for concern that the gap between the current Technician Class license requirements and the General Class license requirements will create a chasm of difficulty for those seeking to obtain access to the high frequency (short wave) spectrum which is not available to Technician Class licensees. This is a particular concern with respect to young individuals (under age 18) interested in the Amateur Service. While the requirements for passing the Technician Class examination is well within the reach of most high school aged students and many younger, the jump to the General Class material is significant. Unfortunately, the Technician Class license does not allow access to the high frequency spectrum.

The Commission has indicated a strong desire to not introduce any new license class at this time. However, an intermediate step presently exists to allow limited access to the high frequency spectrum (short waves) without the need to

pass the General Class examination. That option consists of passing the written examination for the Technician Class license and a 5 word per minute Morse code examination. Upon obtaining this Technician “plus” status, the individual is allowed access to the Novice Class high frequency allocations. Short of providing a new entry level license for high frequency operation, the undersigned strongly urges the Commission to maintain the current option for Technician Class licensees to gain access to the high frequency spectrum by means of the Morse code option. The testing materials already exist for this examination and the record keeping burden on the Commission is minimal. Further, no change in the regulations is required by this proposal. The Commission should not eliminate this licensing option.

Respectfully submitted on this 31<sup>st</sup> day of October, 2005.

Timothy T. Jarman  
1420 Hiawatha Trail  
Sioux City, IA 51104-4323

Amateur Extra Class Licensee – K0UX